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Attorneys for Objector Douglas W. St. John

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

**IN RE CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION**

Master File No. 3:07-cv-5944 JST

MDL No. 1917

**DECLARATION OF ATTORNEY
JOSEPH SCOTT ST. JOHN ISO
DOUGLAS W. ST. JOHN'S REPLY
ISO MOTION TO AMEND**

This Document Relates To:
All Indirect Purchaser Actions

Judge: Hon. Jon S. Tigar

Special Master: Hon. Martin Quinn

1 I, Joseph Scott St. John, declare and state as follows:

2 1. I am an attorney duly licensed in the State of Mississippi, the State of Louisiana, and
3 the District of Columbia. I represent Douglas W. St. John, a resident of the State of Mississippi, in
4 connection with the above-captioned matter.

5 2. I make this declaration in support of Objector Douglas W. St. John's Reply in
6 Support of his Motion to Amend the Order Appointing Special Master Quinn.

7 3. I have personal knowledge of the facts stated herein, and if called and sworn as a
8 witness, I would testify truthfully as follows.

9 **PROFESSIONAL BACKGROUND**

10 4. I earned a B.S. in Systems Engineering, with Merit, from the United States Naval
11 Academy in 2003.

12 5. I earned a J.D., with Honors, from The George Washington University Law School
13 in 2008.

14 6. From January 2012 until June 2015, I practiced law as an associate at Covington &
15 Burling LLP in Washington, DC. Prior to that, I served as a law clerk for the U.S. Court of Appeals
16 for the Federal Circuit and practiced with another large law firm. I am now in private practice.

17 7. I have never previously served as counsel in connection with a class action objection.

18 8. I have never filed a class action objection on my own behalf.

19 9. I am informed and believe that my co-counsel, Andrea Valdez, earned a B.S., magna
20 cum laude, from California State Polytechnic University – Pomona in 2001.

21 10. I am informed and believe that my co-counsel, Andrea Valdez, earned a J.D. from
22 Columbia Law School in 2005.

23 11. I am informed and believe that my co-counsel, Andrea Valdez, practiced law as an
24 associate at Fulbright & Jaworski LLP from October 2005 until June 2012. I am further informed
25 and believe that Ms. Valdez lived abroad and was not active in the practice of law from June 2012
26 until July 2015, but she returned to private practice in September 2015.

27 12. I am informed and believe that my co-counsel, Andrea Valdez, has never previously
28 served as counsel in connection with a class action objection.

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13. I am informed and believe that my co-counsel, Andrea Valdez, has never filed a class action objection on her own behalf.

EXHIBITS

14. Exhibit 1 is a true and accurate copy of a document downloaded from the website www.crtclaims.com on December 10, 2015.

15. Exhibit 2 is a true and accurate copy of excerpts from the deposition of Douglas W. St. John.

MISCELLANEOUS

16. I first raised the issues addressed in Mr. St. John's Motion to Amend via email with IPP Counsel Mario Alioto on October 21, 2015.

17. Further declarant sayeth naught.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA THAT THE FOREGOING IS TRUE AND CORRECT.

Executed in New Orleans, Louisiana, the 10th day of December, 2015

/s/ Joseph Scott St. John

Joseph Scott St. John